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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

FEB 2 7 1989

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: EPA Reg. No. 109701. Data Call-In for Permethrin.

Request to waiver certain studies requested in the Comprehensive Data Call-In Notice dated May 31, 1988.

No MRID No. DEB No. 4841.

FROM:

Linda S. Propst, Chemist Dietary Exposure Branch

Health Effects Division (H7509C)

THRU:

Andrew R. Rathman, Section Head

Special Registration Section 1

Dietary Exposure Branch

Health Effects Division (H7509C)

TO:

Geraldine Werdig/Barbara Briscoe Team 50

Data Call-In Staff

Registration Division (H7505C)

In response to the Comprehensive Data Call-In Notice for Data on Permethrin dated May 31, 1988, ICI Americas Inc./FMC Corporation have entered into an agreement to share the burden of generating and submitting the data requested by the Agency. In this particular submission, the registrants have listed numerous data requirements which they believe to be inapplicable.

Registration Division has asked Dietary Exposure Branch for their opinion concerning the inapplicability of two of those listed, aquatic use sites and food/feed handling establishments.

The registrants have listed data requirements as being inapplicable for aquatic use sites since permethrin is not applied directly to water and food/feed handling establishments since permethrin is not registered for use in food/feed handling establishments.

Dietary Exposure Branch's Comments

After reviewing the registered labels submitted by ICI Americas Inc. and FMC Corporation for their permethrin formulations, we agree that data need not be generated for aquatic use sites or food/feed handling establishments.

cc: Reading File, Circulation, Subject File, Reviewer, PMSD/ISB, Branch Chief

RDI: A. R. Rathman, 2/24/89; E. Zager, 2/24/89 H7509C:DEB:LSP:1sp:CM-2:Rm803C:557-7324:2/24/89